Greenleaf Corporation Privacy Notice for Job Applicants – web version

Greenleaf Corporation and its European subsidiary, Greenleaf Europe BV, (both hereinafter "Greenleaf") collect personal information from individuals seeking employment with Greenleaf. This information may include the following categories of personal information:

- Personal and online identifiers (such as first and last name, email address, or unique online identifiers)
- Categories of information described in Section 1798.80(e) of the California Civil Code (such as physical characteristics or description, social security number, driver's license or state identification number, address, insurance policy number, and bank account number)
- Characteristics of protected classifications under state or federal law (such as race or gender)
- Professional or employment-related information
- Education information
- Criminal background history (solely for applicants within the U.S.)
- Other information about you that is linked to the personal information above

This information is collected from the prospective employees themselves through resumes, job applications and interviews, as well as from their prior employers, from references, or from third-party service providers, such as companies providing criminal background checks.

We use and disclose this personal information solely to make hiring decisions.

This information may be shared with third-party service providers in order to help in the collection of further information useful in a hiring decision, such as criminal background check companies.

If you are a resident of California or a resident of the European Union, please see the privacy rights notices below to learn about certain rights you may have with respect to personal information that may be collected by Greenleaf.

Employee Privacy Rights Notice for Residents of California

The terms and conditions contained in this Privacy Rights Notice apply solely to the personal information of California residents we may process. The California Consumer Privacy Act ("CCPA") provides California residents ("you") with specific rights regarding your personal information. This Privacy Notice describes those CCPA rights and explains how to exercise them.

You have the right to request certain information about Greenleaf's collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request (as described further below), we will disclose to you (to the extent possible and permitted by law):

- The categories of personal information we collected about you;
- The categories of sources from which we collected your personal information;
- Our business or commercial purposes for collecting your personal information;
- The categories of third parties with whom we shared your personal information; and
- The specific pieces of personal information we collected about you (also called a data portability request).

The CCPA also provides rights with respect to the sale of personal information. However, Greenleaf does not sell personal information, so those rights are not applicable to Greenleaf.

You have the right to request that Greenleaf delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your personal information from our records, and we will direct our service providers to delete your information from their records, unless an exception applies.

To exercise any of the access, data portability and deletion rights described above, please submit a verifiable consumer request to us either by emailing us at: privacy@greenleafcorporation.com; by calling us at: (800) 458-1850, and asking to be put through to the General Counsel or to the Legal Assistant; or by writing to us at:

General Counsel / Legal Assistant Greenleaf Corporation 18695 Greenleaf Drive Saegertown, Pennsylvania 16433

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected the personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we are unable to verify your identity or authority to make the request and confirm the personal information relates to you. Regardless of how you submit your request, we will use personal information provided in a verifiable consumer request only to verify the requestor's identity or authority to make the request.

We will use reasonable efforts to initially respond to a verifiable consumer request within 10 days of its receipt and to provide a substantive response within 45 days of receipt. If we require more time (not to exceed 90 days from receipt), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period before the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data portability requests, we will provide your personal information in a format that is commercially reasonable and should allow you to transmit the information to another entity.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We will not discriminate against you for exercising any of your CCPA rights.

We reserve the right to amend this Privacy Rights Notice at our discretion and at any time. When we make changes to this Privacy Rights Notice, we will post the updated Notice wherever this Privacy Rights Notice has been posted.

If you have any questions or comments about this Privacy Rights Notice, the ways in which we collect and use your personal information, or your choices and rights regarding such use, please contact us either by emailing

us at: privacy@greenleafcorporation.com; by calling us at: (800) 458-1850, and asking to be put through to the General Counsel or to the Legal Assistant; or by writing to us at:

General Counsel / Legal Assistant Greenleaf Corporation 18695 Greenleaf Drive Saegertown, Pennsylvania 16433

Privacy Rights Notice for Residents of the European Union

The terms and conditions contained in this Privacy Rights Notice apply solely to the personal data of European Union residents we may process. The European Union's General Data Protection Regulation ("GDPR") provides European Union residents ("you") with specific rights regarding your personal data. To comply with the requirements of the GDPR, this Privacy Notice outlines the legal basis on which we process your personal data, provides additional information, and describes certain rights you have under the GDPR and how to exercise those rights.

Greenleaf will only process your personal data where we have a lawful basis to do so. The lawful basis for our processing of your personal data will depend on the purposes of the processing. The different lawful bases we rely on are:

- <u>Legitimate interests</u>: Where the processing is necessary for our legitimate business interests. This may include processing to inform you of changes to our products, or to provide you with information about other products we offer.
- <u>Consent</u>: Where you have provided us with consent to process your personal data for a specific purpose, such as when you request that we contact you with information about our products. Where consent is relied upon as the lawful basis for processing your personal data, you may withdraw that consent at any time.
- <u>Contractual necessity</u>: Where the processing is necessary for the performance of or entry into a contract, such as when we administer payroll, health insurance, and other benefits for our employees.
- <u>Legal claims</u>: Where the processing of your personal data is necessary for the establishment, exercise, or defense of legal claims.
- Legal obligation: Where we are required to process your personal data by law.

To determine the period for which your personal data will be retained, Greenleaf considers criteria such as: the purposes for which the data was collected; legal requirements to retain the data for a certain period of time; obligations to retain the data related to actual or potential litigation or government investigations; and contractual requirements to retain the data in relevant agreements.

Greenleaf may transfer personal data outside the European Economic Area (which comprises the countries in the European Union and Iceland, Liechtenstein and Norway) to the United States under appropriate safeguards by way of standard data protection clauses. This includes transferring the personal data of our European employees to the United States to administer payroll, and certain other benefits.

Greenleaf would like to make sure you are fully aware of all of your data protection rights. You are entitled to the following:

- The right to access: You have the right to request of Greenleaf copies of your personal data. We may charge you a small fee for this service.
- <u>The right to rectification</u>: You have the right to request that Greenleaf correct any data you believe is inaccurate. You also have the right to request Greenleaf to complete data you believe is incomplete.

- <u>The right to erasure</u>: You have the right to request that Greenleaf erase your personal data, under certain conditions.
- The right to restrict processing: You have the right to request that Greenleaf restrict the processing of your personal data, under certain conditions.
- The right to object to processing: You have the right to object to Greenleaf's processing of your personal data, under certain conditions.
- The right to data portability: You have the right to request that Greenleaf transfer the personal data that we have collected to another organization, or directly to you, under certain conditions.
- The right to lodge a complaint with a supervisory authority: Greenleaf will diligently seek to address and settle any requests or complaints brought to its attention. In addition, you have the right to approach the competent data protection authority with requests or complaints. This can be the supervisory authority in the country or federal state where you live.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us by email at: privacy@greenleafcorporation.com; or by phone in the U.S. at: (814) 763-2915, and ask to be put through to the General Counsel or to the Legal Assistant; or by writing to us at:

General Counsel / Legal Assistant Greenleaf Corporation 18695 Greenleaf Drive Saegertown, Pennsylvania 16433

Please note that this website and other Greenleaf websites are published in the United States. If you are located within the European Union, you should be aware that when you access these websites and provide your personal data, you are transferring your personal data to the United States where it is being collected and processed. We will take steps reasonably necessary to ensure that your personal data is subject to appropriate safeguards and that it is treated securely and in accordance with this privacy statement.